

EXHIBIT 4

VESTA CORPORATION,)	
)	
Plaintiff,)	CIVIL ACTION NO. 4:15-CV-00719
)	
V.)	
)	
VESTA MANAGEMENT SERVICES, LLC,)	
)	
Defendant.)	
)	

1. I am over the age of 18, believe in the obligations of an oath, and have personal knowledge of the matters set forth below.

2. I am the Director of Physical Plant for Vesta Corporation, a Connecticut corporation with a principal place of business located at 175 Powder Forest Drive, Weatogue, Connecticut 06089.

3. I submit this declaration in further support of plaintiff Vesta Corporation's Motion for Summary Judgment and in opposition to defendant Vesta Management's Motion for Summary Judgment.

4. I have worked at Vesta Corporation or its predecessor since 1995.

5. As Director of Physical Plant, my job responsibilities include overseeing the physical plant of all properties in Vesta Corporation's portfolio, contract services, and purchasing of supplies and materials order from vendors.

SUPPLEMENTAL DECLARATION OF PAUL BEARCE – PAGE 1
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7. Cintas Corporation quoted Vesta Corporation a price of \$13.80 per shirt based on an order quantity of 70 shirts.

8. The price of \$13.80 per shirt included a patch depicting Vesta Corporation's logo.

9. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 11, 2016



Paul Bearce
Director of Physical Plant
Vesta Corporation

EXHIBIT A

ATTORNEY-CLIENT PRIVILEGE

From: McLoughlin, Stephen [<mailto:McLoughlinS@cintas.com>]
Sent: Monday, April 06, 2015 7:45 AM
To: Paul Bearce <paul@vestacorp.com>
Subject: FW: Vesta# 12368, 12412 and 14152

Paul,

Please see below for the pricing of purchasing garments. Also, please see the 2 Agreements attached. 1 is for continuing the rental program and 1 is for the Uni-lease program where the employees launder their own garments. Please contact me ASAP as your current Agreement has expired. Also, please send me the complete list of facilities and their addresses so I can add them to the MLRA.

Purchase \$:
270 Pant – Qty 70 - \$22.15
935 Shirt – Qty 70 - \$13.80
677 jacket – Qty 28 - \$31.20

Thanks

Stephen McLoughlin
Cintas Corporation
300 Highland Corp. Drive
Cumberland, RI 02864
Ofc. 401-235-6400
Fax. 401-235-6435
mcloughlins@cintas.com



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